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Before the
Federal Communications Commission
Washington, DC

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Amendment of Section 202(b),)
Table of Allotments,) RM-
FM Broadcast Stations)
(Eatonton, Sparta, Fayetteville,)
Griffin, Hogansville, Greenville,)
and Thomaston, Georgia; Ashland,)
Alabama)

ORIGINAL
FILE

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Good Medicine Radio, Georgia, Inc., licensee of Station WSKS(FM), Sparta, Georgia ("GMR"), and Design Media, Inc., licensee of Station WQUL(FM), Griffin, Georgia ("DMI"), hereby requests that the Commission amend the Table of Allocations as follows:

Eatonton, Georgia

<u>Present</u>	<u>Proposed</u>
None	249C3

Sparta, Georgia

249A, 274A	274A
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Fayetteville, Georgia

None	248C3
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Griffin, Georgia

249A	None
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Hogansville, Georgia

248A	239A
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239A 237A

239A 237A

237A 238A

237A 238A

237A 266A

237A 266A

1. Stations WQUL and WSKS originally requested the upgrade of their stations from Class A to Class C3 by petitions for rulemaking filed on September 28, 1989 and February 28, 1990, respectively. The petitions proposed to amend the FM Table of Allotments to substitute Channel 248C3 for Channel 249A at Griffin, Georgia, and Channel 249C3 for Channel 249A at Griffin, Georgia, both of which could be accommodated by substituting Channel 288A for Channel 249A at Hogansville, Georgia. The petitions for rulemaking were adopted by the Commission (Notice of Proposed Rule Making, 5 FCC Rcd 3769 (1990)) and comments were accepted with regard to the proposals. By Report and Order, 6 FCC Rcd 4863 (1991), the FCC declined to adopt the proposals, and instead adopted a counterproposal to allot Channel 288A to Bowdon, Georgia. A petition for reconsideration of that action is pending.

2. This petition, which is being filed jointly by GMR and DMI, again requests the amendment of the Table of Allotments to allow them^{1/} to apply for Class C3 facilities on co- or adjacent

1/ GMR is the successor-in-interest to the earlier petitioner,
(footnote continued)

frequencies, pursuant to 47 C.F.R. § 1.420(g). This can be accomplished by substituting Channel 239A for Channel 248A at Hogansville, Georgia; Channel 237A for Channel 239A at Greenville, Georgia; Channel 238A for Channel 237A at Ashland, Alabama; and Channel 266A for Channel 237A at Thomaston, Georgia. As seen in the attached Engineering Statement, each of the proposed substitutions can be made in full accord with the Commission's Rules and policies. Two existing stations will be affected: Station WTGA(FM), Thomaston, Georgia; and Station WASZ, Ashland, Alabama. In addition, the proposal will affect two authorized but unbuilt stations, Station WEIZ(FM), Hogansville, Georgia; and Channel 239A, Greenville, Georgia. As seen in Attachment 2, Stations WEIZ and WTGA have consented to the substitutions. With respect to the other two stations, Orchon Broadcasting, Inc. ("Orchon") was recently granted a construction permit for Channel 239A, Greenville, Georgia. As seen in Attachment 1, this proposal to change Orchon's frequency from Channel 239A to Channel 237A allows for the continued use of the site designated in Orchon's recently granted construction permit. Similarly, the proposal permits the continued use by Station WASZ of its licensed transmitter site. Therefore, there will be no "forced relocation" of either station. Cf. North Charleston, SC, 47 Fed. Reg. 10560 (March 11, 1982). As required by the Commission's policies, the petitioners will reimburse

(footnote continued from previous page)
Alexander Mitchell Communications Corp., as GMR has since become the licensee of Station WSKS(FM).

Orchon^{2/} and WASZ for the reasonable costs associated with the grant of the proposed change of frequencies, and will reimburse WEIZ and WTGA for the change of frequencies and any relocation costs necessitated by grant of the proposed change of frequencies. Finally, although the petitioners propose the substitution of four authorized stations, two of the affected stations (WEIZ and WTGA) have affirmatively consented to the proposed modifications of their authorizations. Thus, sufficient consent has been obtained for the proposal to comply with the Commission's channel substitution policy. Dyersburg, TN, et al., 4 FCC Rcd 4814, 4815 ¶ 11 (Chief, Allocations Branch 1989).^{3/}

^{2/} As noted above, Orchon is the permittee of a recently authorized but unbuilt station on Channel 239A at Greenville, GA. As it is not an operating station, the costs associated with the change of frequencies will consist almost exclusively of an application (FCC Form 301) to be filed with the Commission requesting a change of channel of operation. It is possible even that application will not be needed. In Pacific Grove and Soledad, CA, 5 FCC Rcd 6700 (Ass't Chief, Policy and Rules Div. 1990), the construction permit of an unlicensed station was simply modified to specify the new channel of operation to accommodate an adjacent channel upgrade proposal, without the prior filing of an FCC Form 301..

^{3/} Under the Commission's current channel substitution policy, the Commission will not entertain proposals which would involve more than two substitutions of channels occupied by existing stations unless consent has been obtained from the additional affected stations or special public interest benefits are shown. Kaukauna and Cleveland, WI, 6 FCC Rcd 7142 n.2 (Ass't Chief, Allocations Branch 1991); Dyersburg, TN, et al., 4 FCC Rcd 4814, 4815 ¶ 11 (Chief, Allocations Branch 1989). As seen herein, not only has consent been obtained by the two affected stations beyond the "two affected station limit," adoption of this proposal has the added public interest benefit of allowing first first-time local service to two communities -- Eatonton and Fayetteville, Georgia; will allow WASZ and WEIZ to upgrade to full Class A facilities; and will allow two existing stations -- WQUL and WSKS -- to upgrade their facilities from Class A to Class C3 operation. For this reason, as well, this proposal comports with the Commission's channel substitution policy.

3. Moreover, GMR and DMI each are proposing to change their cities of license pursuant to Section 1.420(i) of the Commission's Rules. GMR is proposing to amend the city of license of its FM assignment from Sparta, Georgia to Eatonton, Georgia. The proposed allotment is mutually-exclusive with GMR's present allotment, as required by Section 1.420(i) of the Commission's Rules. Approval of this proposal will provide the community of Eatonton (a community with a population larger than Sparta's) with its first full-time local service,^{4/} without depriving Sparta of full-time local service.^{5/} As seen in Attachment 1, Eatonton has all of the indicia necessary to warrant the allotment of an FM channel to the community. Under the Commission's allotment criteria, allotting Channel 248C3 to Eatonton, in order to provide that community with first full-time service, is preferable over keeping it assigned to Sparta as its second full-time local service. Thus, under the Commission's allotment criteria, allotting Channel 248C3 to Eatonton rather than Sparta will result in a preferential arrangement of allotments. In these circumstances, the Commission has stated that it will permit a change of city of license. Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 66 R.R.2d 877, 882 (1991).

^{4/} The only station currently licensed to Eatonton is AM daytime-only station WKVQ(AM).

^{5/} Sparta will continue to be served by WHAN(FM), which is a full-time FM station, and is licensed to Sparta.

4. Similarly, DMI is proposing the amend the city of license of its FM assignment from Griffin, Georgia to Fayetteville, Georgia. The proposed allotment is mutually-exclusive with GMR's present allotment, as required by Section 1.420(i) of the Commission's Rules. Fayetteville currently has no local aural service, while Griffin, Georgia already also has licensed to it full-time stations WHIE(AM) and WKEU(AM). Thus, under the Commission's allotment criteria, allotting Channel 248C3 to Fayetteville rather than Griffin will provide Fayetteville with its first full-time local service, but will not deprive Griffin of local full-time service, thereby creating a preferential arrangement of allotments. This proposal also is in accord with Commission policy for permitting a change of city of license. Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 66 R.R.2d 877, 882 (1991).

5. Therefore, these proposals will be in full accord with the Commission's rules and policies, and adoption of the proposals will be in the public interest insofar as it will allow for new and improved service to the public, without requiring the Commission to reconsider its decision in MM Docket No. 90-309. Upon final grant of this proposal, the Commission will be able to dismiss DMI's petition for reconsideration in that proceeding as moot, thus allowing an allotment which will provide for first local service at Bowdon, Georgia to be retained.

WHEREFORE, it is respectfully requested that this Petition be adopted, and that the Commission issue a Notice of Proposed Rule Making inviting public comment on the proposals contained herein.

Respectfully requested,

By: 

Dan J. Alpert

Counsel for Good Medicine
Radio, Georgia, Inc. and
Design Media, Inc.

1250 Connecticut Ave., N.W.
7th Floor
Washington, DC 20036

August 14, 1992

ATTACHMENT 1

PETITION FOR RULE MAKING
GOOD MEDICINE RADIO, GA, INC.
& DESIGN MEDIA, INC.
NUMEROUS COMMUNITIES
IN THE STATE OF GEORGIA AND ALABAMA
August 1992

Technical Exhibit

TE-1

Bromo Communications, Inc.
P.O. Box M - 1331 Ocean Boulevard, Suite 201
St. Simons Island, Georgia 31522 .
(912) 638-5608

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PETITION FOR RULE MAKING
GOOD MEDICINE RADIO, GEORGIA, INC.
SUBSTITUTE CH 249C3 FOR CH 249A
RE-ALLOT CH 249C3 TO EATONTON, GEORGIA
DESIGN MEDIA, INC.
SUBSTITUTE CH 248C3 FOR CH 249A
RE-ALLOT CH 248C3 TO FAYETTEVILLE, GEORGIA
August 1992

TECHNICAL STATEMENT

1. This Petition for Rule Making was prepared on behalf of Good Medicine Radio, Georgia, Inc. ("GMRGI"), licensee of Radio Station WSKS, Channel 249A, Sparta, Georgia and Design Media, Inc. ("DMI"), licensee of Radio Station WQUL, Channel 249A, Griffin, Georgia, referenced to jointly as "Petitioners". The petitioners seek to upgrade their respective facilities by first substituting Channel 249C3 for Channel 249A at Sparta, Georgia and re-allotting the improved channel to Eatonton, Georgia. In order to accommodate the Sparta/Eatonton proposal, it is necessary to substitute Channel 248C3 for Channel 249A at Griffin, Georgia. The Petitioners further request that the improved channel then be re-allotted to Fayetteville, Georgia. In order to allow the Griffin/Fayetteville upgrade, it is necessary to substitute channels at Hogansville, Greenville, Thomaston (all Georgia), and Ashland, Alabama, as described further below:

2. The Commission refrains from adopting a Rule Making petition that proposes to make more than two changes in channels which affect authorized facilities other than the petitioners, unless an agreement is reached with the additional affected stations prior to the filing of the Petitions. In this case, four substitutions (other than the Petitioners' upgrades) are required, but two of the affected facilities (Hogansville and Thomaston) have consented to the change in channels. For the other two impacted facilities (Greenville and Ashland), the proposed channel substitutions can be made at their respective authorized sites.

BACKGROUND

3. In September 1989, a Petition for Rule Making was filed by DMI to upgrade WQUL from Channel 249A to Channel 248C3 at Griffin, Georgia. Subsequent to the issuance of a Notice for Rule Making, a second petition filed by Alexander-Mitchell Communications Corporation ("AMCC"), the former licensee of WSKS, sought to upgrade WSKS to Channel 249C3 from Channel 249A at Sparta, Georgia. The AMCC request also required the substitution of Channel 248C3 for Channel 249A at Griffin, Georgia. Both requests required the substitution of Channel 288A for Channel 248A at Hogansville, Georgia. The Commission released the Notice in MM Docket #90-309 on June 22, 1990.

4. A counterproposal was filed to allot Channel 288A to Bowdon, Georgia as first local service, rather than as a substitute Channel at Hogansville. In replies, DMI and AMCC suggested that Channel 223A be allotted to Bowdon, Georgia¹ rather than Channel 288A. This alternate channel would have removed the conflicts in the docket, thus potentially allowing for the upgrades at Sparta and Griffin.

5. The Report and Order ("R&O") in MM Docket #90-309, DA 91-987 (August 14, 1991) denied the DMI and AMCC requests and allotted Channel 288A to Bowdon, Georgia. The R&O noted that the alternate Channel for Bowdon could not be accommodated due to shortspacing with other Commission authorized facilities.² DMI and AMCC petitioned for reconsideration of the order. The petition remains pending before the staff.

6. This instant petition again requests the upgrade of WSKS and WQUL, and still requires the change of allotment at Hogansville, Georgia, which will be accomplished through newly proposed means. The requests contained in this petition when granted and filed will obviate the need for reconsideration of the matter in Docket #90-309.

1. DMI urged that Channel 223A be allotted to Bowdon, Georgia under former §73.207 rules since its proposed upgrade and other requested substitutions were filed prior to October 2, 1988.
2. The dismissal of DMI's alternate channel for Bowdon was based on current §73.207 six kilowatt spacing requirements.

GENERAL OVERVIEW

7. The petitioners request that Channel 249C3 be substituted for Channel 249A at Sparta, Georgia. Further, it is requested that the upgraded channel be re-allotted from Sparta to Eatonton, Georgia. In order to accommodate the upgrade at Sparta/Eatonton, it is requested that Channel 248C3 be substituted for Channel 249A at Griffin, Georgia and the upgraded channel be re-allotted to Fayetteville, Georgia.

8. It is further requested that Channel 239A be substituted for Channel 248A at Hogansville, Georgia, in order to allow the proposed substitution at Griffin/Fayetteville. The use of Channel 239A at Hogansville requires the substitution of Channel 237A for Channel 239A at Greenville, Georgia and Channel 238A for Channel 237A at Ashland, Alabama. In order to accommodate the substitution at Greenville, it is further necessary to substitute Channel 266A for Channel 237A at Thomaston, Georgia.

9. Each of the proposals can be be instituted in full compliance with the Commission's policies. Therefore, the Petitioners ask that §73.202(b) be amended as outlined below.

PROPOSAL

10. It is requested that Channel 249C3 be substituted for Channel 249A at Sparta, Georgia and that the improved channel be re-allotted to Eatonton, Georgia as that community's first local full time aural service. Channel 249C3 can be allotted to Eatonton at reference coordinates North Latitude 33° 23' 03" and West Longitude 83° 19' 22". These coordinates represent a site restriction 8.8 kilometers northeast of the community to avoid shortspacing WKXK, Channel 250C3, Fort Valley, Georgia. A 3.16 mV/m signal will be delivered to all of Eatonton from the reference site. Exhibit #1 is a Usable Area Study which visually demonstrates the area in which to locate a transmitter site for Channel 249C3 at Eatonton. A spacing study is attached as Exhibit #2. Both exhibits assume Channel 249A at Griffin, Georgia has been deleted in favor of Channel 248C3 at Fayetteville, Georgia, as proposed below. As noted on Exhibit #2, Channel 249C3 meets §73.207 spacing requirements to all other authorized, applied for or proposed facilities. Channel 249C3 at Eatonton is mutually exclusive with the present Channel 249A allotment at Sparta.

11. Presently, Eatonton has one local licensed AM daytime station, WKVQ, operating on 1520 kHz. The community

does not have any local full time FM service licensed to it.³ Based on 1990 census figures, Eatonton, an incorporated city, has a population of 4,737 persons while Sparta has population of only 1,710 persons. Sparta presently has one other authorized FM service, WHAN, Channel 274A. The re-allotment of Channel 249C3 to Eatonton would therefore not deprive Sparta of its only local full time service and would provide Eatonton, a larger community, with its first authorized full time service. Sparta will continue to receive 1.0 mV/m service from the upgraded channel at Eatonton.

12. Eatonton has a mayor and seven member city council. The city provides its own police protection and has its own post office. Eatonton has a volunteer fire department which is supported by the city and, in part, the county. There are numerous businesses, financial institutions and residential areas in the city. Eatonton also has a variety of civic organizations such as Lions Clubs, Mason Lodge and Elks Club in the community. Eatonton has all the necessary community identia to warrant the allotment of an FM channel.

3. In MM Docket #89-585, Steven D. King ("King") requested the allotment of Channel 262A to Eatonton, Georgia. However, King withdrew his interest in the Eatonton channel during the comment period in that docket. A late expression of interest was filed for the Eatonton channel, but since it was not filed in a timely manner, the Commission did not allot Channel 262A to Eatonton.

13. Channel 248C3 can be substituted for Channel 249A at Griffin, Georgia and the new channel can be re-allotted to Fayetteville, Georgia at reference coordinates 33° 25' 42" and West Longitude 84° 28' 22". These coordinates reflect a site restriction of 2.7 kilometers south-southwest of the community to avoid shortspacing WFOX, Channel 246C, Gainesville, Georgia. Fayetteville will receive a 3.16 mV/m signal from this hypothetical reference site. Attached as Exhibit #3 is the Detailed Usable Area Study for Channel 248C3 at Fayetteville, Georgia. A Channel 248C3 allocation analysis is attached as Exhibit #4. Both exhibits assume that Channel 239A is substituted for Channel 248A at Hogansville as proposed. As demonstrated on Exhibit #4, Channel 248C3 meets §73.207 spacing requirements to all other Commission authorized, applied for or proposed facilities. Channel 248C3 at Fayetteville is mutually exclusive with the present Channel 249A allotment at Griffin.

14. Fayetteville, Georgia, an incorporated community with 5,827 persons according to the 1990 census, presently has no local aural service. Griffin, while having a larger population, is serviced by two other stations, WHIE (AM), 1320 kHz and WKEU (AM), 1450 kHz, which are licensed to Griffin, both of which will remain licensed to Griffin. WKUE (AM) is a full time station. Further, Griffin would continue to receive greater than a 1.0 mV/m service from the improved Channel 248C3 allotment at Fayetteville.

15. According to the 1980 and 1990 census data, neither Griffin nor Fayetteville is located within the Atlanta Urbanized area. Therefore, service provided by Atlanta stations should not be attributed to either community. Fayetteville has an elected mayor and five member city council. The city provides its own fire and police services, separate from county services. Fayetteville has its own post office, banks and numerous businesses. The necessary community identity is present in Fayetteville to demonstrate the need for a local FM station. Fayetteville is the county seat of Fayette county.

16. T. Wood and Associates, Inc. ("Wood") holds a construction permit for WEIZ, Channel 248A, Hogansville, Georgia. Channel 239A can be allotted to Hogansville, in substitution of Channel 248A, a site restricted 11.5 kilometers south-southwest from the community, to avoid shortspacing WKLS, Channel 241C, Atlanta, Georgia, at coordinates North Latitude 33° 06' 18" and West Longitude 85° 00' 27". A 3.16 mV/m contour will be delivered over all of Hogansville from the proposed site. It should be noted that this is not the site presently authorized in the WEIZ construction permit. However, Wood has consented to the site relocation. Exhibit #5 visually demonstrates the usable area for Channel 239A at Hogansville, Georgia. Exhibit #6 is a Spacing Study for Channel 239A at the proposed reference

site. The allotment of Channel 239A to Hogansville assumes that Channel 237A has been substituted for Channel 239A at Greenville, Georgia, as proposed below. Exhibit #6 demonstrates that Channel 239A meets §73.207 spacing requirements to all other authorized, applied for or proposed facilities

17. Since the permittee at Hogansville has consented to the substitution of channels, the Petitioners have agreed to reimburse Wood for reasonable expenses associated with the site relocation and the channel change. The allotment of Channel 239A will allow WEIZ to operate with 6.0 kilowatts. Woods' present channel (248A) has shortspacings with four other Commission authorized facilities and is precluded from easily upgrading to a maximum 6.0 kilowatt Class A facility. These grandfathered shortspacing limitations will be eliminated by adoption of this proposed channel substitution.

18. Channel 237A can be allotted to Greenville, Georgia in substitution for Channel 239A at reference coordinates North Latitude 32° 54' 00" and West Longitude 84° 46' 54". This site represents a site restriction of 15.4 kilometers south-southwest of the community to avoid shortspacing WPCH, Channel 235C, Atlanta, Georgia and to accommodate the use of the channel at the present construction permit site for Channel 239A at Greenville, Georgia, held by Orchon Broadcasting Company, Inc. ("Orchon") A 3.16 mV/m signal

will be delivered to Greenville from the herein proposed reference site. The Petitioners request Orchon be ordered to change channels to specify operation on Channel 237A in lieu of Channel 239A. The Petitions will reimburse Orchon for reasonable expenses incurred in the channel change.

19. Attached, as Exhibit #7 is the Detailed Usable Area Study for Channel 237A at Greenville. A §73.207 spacing analysis for Channel 237A is Exhibit #8. Both exhibits assume that WASZ, Channel 237A, Ashland, Alabama, has been ordered to Channel 238A and that WTGA, Channel 237A, Thomaston, Georgia has been ordered to Channel 266A, as proposed below. Further, the exhibits also reflect the required spacing to WEIZ Hogansville, Georgia on Channel 239A. As demonstrated in Exhibit #8, channel 237A meets §73.207 spacing requirements to all other authorized, applied for or proposed facilities.

20. Channel 238A can be substituted for Channel 237A at Ashland, Alabama, at the present WASZ transmitter site, reference coordinates North Latitude 33° 18' 30 and West Longitude 85° 50' 58". City grade coverage to Ashland, Alabama, will be maintained from this location. Exhibit #9 is a usable area study for Channel 238A at Ashland, Alabama. Exhibit #10 is a §73.207 spacing study for Channel 238A from the present WASZ site. The Petitioner requests that WASZ be

ordered to change channels at Ashland, Alabama. It should be noted that WASZ presently operates as a 3.0 kW equivalent Class A station. On Channel 238A, WASZ could operate as a maximum 6.0 kW equivalent Class A facility.

21. Channel 266A can be substituted for Channel 237A at Thomaston, Georgia at reference coordinates North Latitude 32° 54' 08" and West Longitude 84° 23' 13".⁴ While this site is not the presently authorized site for WTGA, Thomaston, Georgia, it is only 5.25 kilometers from the WTGA site. This restriction from the present WTGA site will avoid shortspacing WCJM, Channel 265A, West Point, Georgia.

22. The licensee of WTGA, Radio Georgia, Inc. has reached an agreement with the petitioners to relocate its site for WTGA, if necessary, to accommodate the proposed channel substitution.⁵ Thomaston will be completely served by city grade service from the Channel 266A reference site. Exhibit #11 is the detailed Usable Area Study for Channel 266A at Thomaston. A §73.207 spacing analysis is attached as Exhibit #12 and demonstrates that Channel 266A meets Commission requirements to all authorized, applied for or proposed facilities.

4. Channel 266A had been allotted to Hannahs Mill, Georgia in MM Docket #89-547. However, a Petition for Reconsideration was filed asking that the channel be removed. The Commission granted the reconsideration and deleted Channel 266A at Hannahs Mill, DA 92-719, released June 18, 1992.

5. Under §73.215 of the Commission's rules, Channel 266A can be utilized at the present WTGA site as a six kilowatt Class A facility, which is the intention of the licensee for WTGA. This further minimizes the actual impact of this proposal.

PUBLIC INTEREST ASPECTS

23. When WSKS is upgraded to a Class C3 facility, it will enable the facility to serve 83,989 persons (based on 1990 census figures) in 4,759.5 square kilometers. This represents an increase of 2,929.6 square kilometers and 55,466 persons over its presently authorized facility. WQUL will likewise increase the population within its 1.0 mV/m contour to 867,736 persons and the area to 4,782.3 square kilometers, which is an increase of 744,796 persons and 2,445.4 square kilometers over the present Class A facility.

24. Further, adoption of this proposal will allow WEIZ to operate as a maximum Class A facility. The increase from three to six kilowatts will allow WEIZ to serve 68,589 persons in 2,497.8 square kilometers. This is an increase of 9,113 persons and 670.6 square kilometers over its presently authorized facility.

25. The adoption of this proposal will also allow WASZ to upgrade to a maximum Class A facility, thus enabling it to serve 20,376 people in 2275.3 square kilometers. This represents an addition of 7,108 persons in 612 kilometers over its presently authorized facility.

8. WASZ presently operates with 1.0 kilowatts and antenna height above average terrain of 165 meters. The population increase is based on an increase of effective radiated power to 2.0 kilowatts

26. This proposal will enable two existing facilities to expand their coverage and provide two communities which presently either have no local service or no full time local service with their first full time local FM stations.

REQUESTED CHANGES TO §73.202(b)

27. Good Medicine Radio, Georgia, Inc. and Design Media, Inc. request the following changes be made to the Commission's table of FM allotments:

Eatonton, Georgia

Present
None

Proposed
249C3

Sparta, Georgia

Present
249A, 274A

Proposed
274A

Fayetteville, Georgia

Present
None

Proposed
248C3

Griffin, Georgia

Present
249A

Proposed
None ⁷

7. AM Stations WKEU (AM) (fulltime) and WHIE (AM) will remain licensed to Griffin, Georgia.

Hogansville, Georgia

Present
248A

Proposed
239A

Greenville, Georgia

Present
239A

Proposed
237A

Ashland, Alabama

Present
237A

Proposed
238A

Thomaston, Georgia

Present
237A

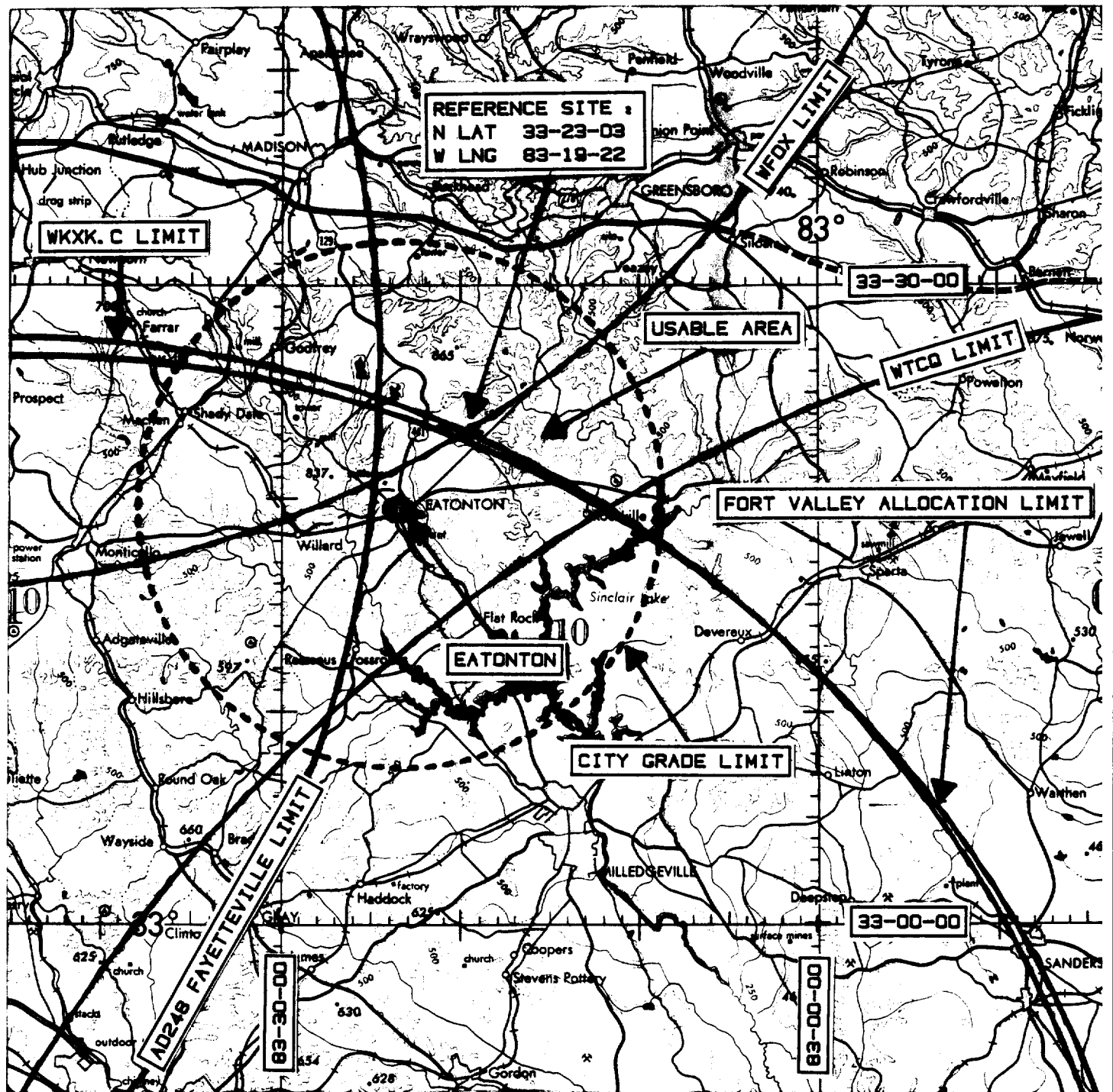
Proposed
266A

28. When Channel 249C3 is allotted to ~~East~~atonton, Georgia, GMRGI will file, on a timely basis, an application for construction permit to make minor changes in the facilities of WSKW to specify operation to Channel 249C3. DMI, upon the allotment of Channel 248C3 at Fayetteville, will file an application for construction permit to make minor changes in the facilities of WQUL to operate on Channel 248C3 at Fayetteville.

29. The Petitioners also restate their willingness to reimburse the permittee of WEIZ and the licensee of WTGA for reasonable expenses in order to make the needed channel changes and site relocations at Hogansville and Thomaston,

respectively. Further, the Petitioners will reimburse the permittee at Greenville, Georgia and the licensee of WASZ for the requested channel changes at Greenville and Ashland.

30. The foregoing technical statement was prepared on behalf of the petitioners by Bromo Communications, Inc., their Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of these comments, we welcome the opportunity to discuss the matter by phone at (912) 638-5608.



USABLE AREA CHANNEL 249C3

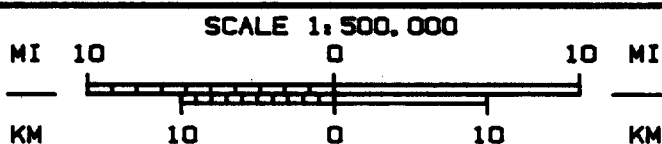
MAP IS A PORTION OF THE 1,500,000 SCALE ATLANTA SECTIONAL AERONAUTICAL CHART.

MAP ASSUMES THAT WQUL GRIFFIN, GA HAS BEEN ORDERED TO CHANNEL 248C3 AT FAYETTEVILLE, GEORGIA.

EXHIBIT #1

PETITION FOR RULE MAKING
GOOD MEDICINE RADIO, GA, INC
& DESIGN MEDIA, INC
NUMEROUS COMMUNITIES
IN THE STATE OF GEORGIA

August 1992



BROMO
COMMUNICATIONS
BROADCAST TECHNICAL CONSULTANTS
St Simons Island, Georgia Washington, D.C.